

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Thomas Williams

Case: 2:22-mj-30076

Case No.

Judge: Unassigned,

Filed: 02-16-2022 At 12:14 PM

USA v. SEALED MATTER (CMP)(MLW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 15, 2020 to January 22, 2021 in the county of Oakland in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

18 U.S.C. 1343

Offense Description

Wire Fraud

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: February 16, 2022

City and state: Detroit, MI

*Complainant's signature*Special Agent William B. Schulz*Printed name and title**Judge's signature*Anthony P. Patti, U.S. Magistrate Judge*Printed name and title*

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

I, William B. Schulz, being duly sworn, depose and state as follows:

1. I am a Special Agent with the United States Secret Service assigned to the Detroit Field Office. I have been a Special Agent since August of 2002. I have a Bachelor of Science degree with a focus in Criminal Justice. I have over twenty-one years of law enforcement experience and have conducted numerous criminal investigations. I have received training in general law enforcement and criminal investigations at the Federal Law Enforcement Training Center, and at the United States Secret Service Rowley Training Center. I am currently assigned to the Southeast Michigan Financial Cyber Fraud Task Force (SEMCFTF), a cooperative effort consisting of members from local Michigan Police Departments, and the Federal Government. The task force collectively investigates criminal violations of both federal and state fraud laws. The information contained in this affidavit is based on my training, experience, and participation in financial fraud investigations, my personal knowledge and observations during the course of this investigation, and information provided to me by other investigators regarding a financial fraud transaction scheme.

2. The information set forth in this affidavit is based upon my knowledge and investigation, as well as from information that I have obtained from witnesses,

other law enforcement officers, and the review of records and documents. This affidavit does not contain every fact that I have learned during the investigation, but only those facts which I believe are necessary to establish probable cause.

DETAILS OF INVESTIGATION

3. On February 12, 2021, the SEMCFTF received information that Thomas WILLIAMS was the recipient of numerous suspicious deposits into his Citizens Bank account ending in #4632. The suspicious deposits included numerous unemployment benefits payable to individuals other than WILLIAMS, and several wire deposits originating from commercial businesses including Liberty Call Distilling, Spring Valley, CA, and Main Street Group, Woodstock, Ontario, Canada.

4. On February 17, 2021, your Affiant spoke with the owner of Liberty Call Distilling, who indicated that his business was the victim of a fraud in December 2020, that he reported to the San Diego County Sheriff's Department. The owner went on to state that his company has been producing hand sanitizer during the COVID 19 pandemic. The company received an order via email, from "Noe Guitroz" and "Filipo Hernandez," for a large quantity of hand sanitizer. The purchasers requested that Liberty Call Distilling ship the product utilizing a company named Wetland Logistics. Wetland Logistics provided Liberty Call

Distilling with shipping payment instructions via email. On December 15, 2020, Liberty Call Distilling wired \$24,301.00 in shipping costs from its bank account in California to Wetland Logistics per the emailed instructions. On December 16, 2020, Liberty Call Distilling was notified by their financial institution that the purchase of the hand sanitizer by “Noe Guitroz” and “Filipo Hernandez” was declined due to the use of fraudulent credit cards.

5. Affiant has reviewed bank records that confirm the following. On December 15, 2020, there was a wire transfer from Liberty Call Distilling in California, in the amount of \$24,301.00 that was credited to Thomas WILLIAMS’ Citizens Bank checking account #4632 in the Eastern District of Michigan. That same day, there was an online transfer of \$24,300.00 from WILLIAMS’ checking account #4632 to WILLIAMS’ savings account #8519.

6. On December 16, 2020, a withdrawal in the amount of \$10,000 was made from WILLIAMS’ savings account #8519. On December 17, 2020, a withdrawal of \$8,400 was made from the account. On December 17, 2020, a withdrawal of \$6,750 was made from the account.

7. On February 23, 2021, a representative of the Ontario Provincial Police spoke with Affiant and described a fraudulent scheme affecting the Main Street Group, Woodstock, Ontario, Canada. Main Street Group has been producing and

selling hand sanitizer and other cleaning products during the COVID 19 pandemic. Main Street Group received an email order from “Noe Guitroz,” totaling approximately \$85,000.00. Main Street Group received shipping payment wire instructions via email from Wetland Logistics. Main Street Group wired Wetland Logistics \$9,357.00 per the wiring instructions. Main Street Group was later notified by its financial institution that the purchase of the supplies by “Noe Guitroz” was declined due to the use of fraudulent credit cards.

8. Bank records confirm that on January 20, 2021 a wire transfer from the Main Street Group INC account in Canada in the amount of \$3,550.00 was credited to WILLIAMS’ checking account #4632 in the Eastern District of Michigan. That same day, \$3,440.00 was withdrawn from the #4632.

9. On January 22, 2021, a wire transfer from Main Street Group INC in the amount of \$5,917.00 was credited to WILLIAMS’ checking account #4632. That same day, a withdrawal in the amount of \$5,900.00 was made from the account.

10. Citizens Bank records indicate that Thomas WILLIAMS is the holder of the accounts ending in #4632 and #8519. Also, Affiant has compared bank branch surveillance images coinciding with access to the above accounts and compared them with known photos of Thomas WILLIAMS from Michigan Secretary of State records and has determined that they depict the same individual.

11. On May 4, 2021, your Affiant interviewed Thomas WILLIAMS at the Novi

Police Department (Michigan). During the interview, Thomas WILLIAMS stated that he had received numerous deposits into his Citizens Bank account since its opening but was unaware as to the source of the funds. Thomas WILLIAMS also indicated that his girlfriend, who resides in Ghana and whom he claims to have never spoken to or met, was responsible for coordinating the transactions. Thomas WILLIAMS stated that he was instructed by his girlfriend to withdraw and transfer the funds via wire or cryptocurrency to accounts and addresses provided by her via text and email. Thomas WILLIAMS indicated that he did benefit from a small portion of the funds at various times that he used for personal expenses. Thomas WILLIAMS denied having any contact with victims or victim businesses to coordinate the unauthorized transactions. Thomas WILLIAMS also indicated that he was concerned that at some point law enforcement would contact him regarding the legitimacy of the transactions.

12. Based on the above, affiant believes that there is probable cause to establish that Thomas WILLIAMS committed wire fraud by fraudulently causing and aiding and abetting in causing funds from both Liberty Call Distilling and Main Street Group to be transferred in interstate and foreign commerce into his account at Citizens Bank in the Eastern District of Michigan, and also by forwarding proceeds via wire transfers in interstate and foreign commerce from his Citizens Bank

account in the Eastern District of Michigan to accounts located outside of the State of Michigan, in violation of 18 U.S.C. §1343.

Respectfully submitted,



William B. Schulz, Affiant
Senior Special Agent
United States Secret Service

Sworn to before me and signed in my presence
and/or by reliable electronic means.



Anthony P. Patti February 16, 2022
United States Magistrate Judge